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US EPA RECORDS CENTER REGION 5



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PRC

**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**FORMER G.S. PLASTICS COMPANY
CUYAHOGA HEIGHTS, OHIO
OHD 980 569 289**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

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PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the former G.S. Plastics Company (currently Sterling Engineered Products (SEP)) facility in Cleveland, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The SEP facility currently produces solvent-based polyester laminate compounds, primers, reducers, solvent-based paint, and plastisol synthetic resins which are a nonflammable product used in medical, tooling, construction, and other industries.

The primary waste stream generated at the SEP facility is plasticizer mixed with spent aromatic 100 solvent, a naphtha-based solvent used for tank cleaning. The waste solvent mixed with plasticizer is hazardous and is classified as combustible F003 waste. Nonhazardous solid waste cardboard and resin powder are also generated.

The facility occupies approximately 30,000 square feet (0.687 acres) in an industrial area of Cuyahoga Heights, Ohio. SEP has operated at this location under several different corporate names. Operations at the facility have remained essentially unchanged since the 1950s. SEP currently employs 11 people. In addition to the manufacturing plant, the facility includes a shipping dock and parking lots. The facility currently operates as a small quantity generator storing waste on site for less than 90 days. The facility submitted a RCRA Part A permit application in 1981 for storage of hazardous waste D001 in containers. Facility representatives stated that OEPA advised the facility to list the waste as a D001 code. In July 1982, EPA submitted a letter to the facility indicating that it appeared to qualify as a small quantity generator. In addition, EPA requested a written determination of the facility's status and that the facility withdraw its Part A permit application if it did not store waste on site for more than 90 days. In 1983, G.S. Plastics submitted a letter to EPA requesting a change in status to that of generator accumulating waste on site for less than 90 days. In 1984, OEPA informed EPA that the facility was no longer operating as a storage facility. Consequently, EPA changed the status of the facility to that of a generator storing less than 90 days.

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The original building was constructed in 1947 when Klausner Cooperative used the site to make wooden barrels. G.S. Plastics started at the location in the 1950s. In 1970, G.S. Plastics merged with Custom Trim Products of Cuyahoga Heights, Ohio. Processes and products at that time included extrusion and powder compounding products, solvent-based paints, primers, and reducers. In 1977, Custom Trim Products was sold to the Libbey Owens Ford Company (LOF) of Toledo, Ohio. The processes at the plant remained the same as in the 1970s.

In 1986, LOF restructured and the facility was named Sterling Engineered Products (SEP). Extrusion compounding and almost all powder compounding ceased. At that time, the solvent-based polyester laminating compounding line was introduced as one of the paint department product lines. The LOF name was dropped and Trinova was created. In 1988, the company changed the SEP name to Aeroquip, Automotive Products Group. After a legal question concerning the name, the Sterling Engineered Products name was reinstated for this facility. All powder production ceased at that time.

The PA/VSI identified the following three SWMUs at the facility:

Solid Waste Management Units

1. Hazardous Waste Drum Storage Area
2. Emergency Spill Underground Storage Tank
3. Former Hazardous Waste Drum Storage Area

PRC did not note any AOCs at the facility.

During the VSI, dark oily stains were observed on the western wall and driveway of the facility. It was determined that the stains were the result of spills from tank trucks pumping plasticizer and soybean oil into storage tanks inside the building. According to material safety data sheets, neither the soybean oil or plasticizer contain any hazardous constituents listed in 40 CFR part 261 Appendix VIII. Consequently, it was presumed that no hazardous constituents had been released to environmental media and that this was not an area of concern.

The potential is low for a release of hazardous constituents to ground water from SWMUs 1 and 3. The hazardous waste drum storage area (SWMU 1) is indoors and has adequate containment to limit potential releases to this media. There are no floor drains near this unit. The former hazardous waste drum storage area (SWMU 3) is inactive. There was no visible evidence

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of a release observed during the VSI and there has been no documented releases from this unit. The potential for releases from the emergency spill underground storage tank (SWMU 2) is low to moderate. There is no documentation of releases from this unit. However, the integrity of this tank is unknown. Ground water in the area is not used for drinking water or for industrial, agricultural, or municipal supply water. Cuyahoga Heights and the surrounding area obtain drinking water from the City of Cleveland; Cleveland obtains its drinking water from Lake Erie.

The potential for release of hazardous constituents from the facility to surface water is low. The nearest surface water is 0.5 miles southwest of the facility. All surface waters drain into a combined sewer system that leads to the Southerly, Ohio, publicly-owned treatment works.

The potential for releases to air from SWMUs 1, 2, and 3 is low. SWMU 1 is indoors and has no history of documented releases. Drums containing hazardous waste stored in SWMU 1 are sealed. SWMUs 2 and 3 are outdoors. However, there was no visible evidence of a release observed during the VSI, nor have there been any documented releases from either of these SWMUs.

The potential for releases of hazardous constituents to on-site soils from SWMUs 1 and 3 is low. SWMU 1 is indoors and has adequate containment to prevent releases to this media. SWMU 3 is inactive and has no history of documented releases. The potential for releases from the emergency spill underground storage tank (SWMU 2) is low to moderate. There is no documentation of any releases from this unit; however, the integrity of the tank is unknown.

Receptors of potential releases at the facility include SEP personnel and personnel at nearby industries. If releases to air occurred, workers from nearby industries would be receptors. There are 11 people working at the facility. The facility is bordered on the east, north, and west by light industry and is bordered on the south by Grant Avenue. An entrance through a parking lot off Grant Avenue provides access to the facility. An electrical security system controls access through windows and doors. The nearest school is the Sacred Heart School located approximately 0.75 miles east of the facility.

There are no sensitive environments on site. There are several wetlands located within 1 mile of the facility that are associated with three nearby surface waters: the Cuyahoga River, Ohio Canal, and Mill Creek.

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PRC recommends that the integrity of the emergency spill underground storage tank (SWMU 2) and the associated piping be tested to determine if it leaks. PRC recommends no further action for SWMUs 1 and 3.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells**
- Closed and abandoned units**
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units**
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.**

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- **Identify SWMUs and AOCs at the facility.**
- **Obtain information on the operational history of the facility.**
- **Obtain information on releases from any units at the facility.**
- **Identify data gaps and other informational needs to be filled during the VSI.**

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Regional office.

The purpose of the VSI is as follows:

- **Identify SWMUs and AOCs not discovered during the PA.**
- **Identify releases not discovered during the PA.**
- **Provide a specific description of the environmental setting.**
- **Provide information on release pathways and the potential for releases to each medium.**
- **Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.**

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Sterling Engineered Products (SEP), former G.S. Plastics Company, facility in Cuyahoga Heights, Ohio. The PA was completed on March 3, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) Central and Northeast district offices, U.S. Geological Survey (USGS), National Oceanic and Atmospheric Administration (NOAA), U.S. Department of Commerce (DOC), U.S. Department of the Interior (USDI), U.S. Soil Conservation Service (USSCS), and from EPA Region 5 RCRA files. The VSI was conducted on May 20, 1992. It included interviews with SEP

facility representatives and a walk-through inspection of the facility. Three SWMUs but no AOCs were identified at the facility.

PRC completed EPA Form 2070-12, using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and four inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

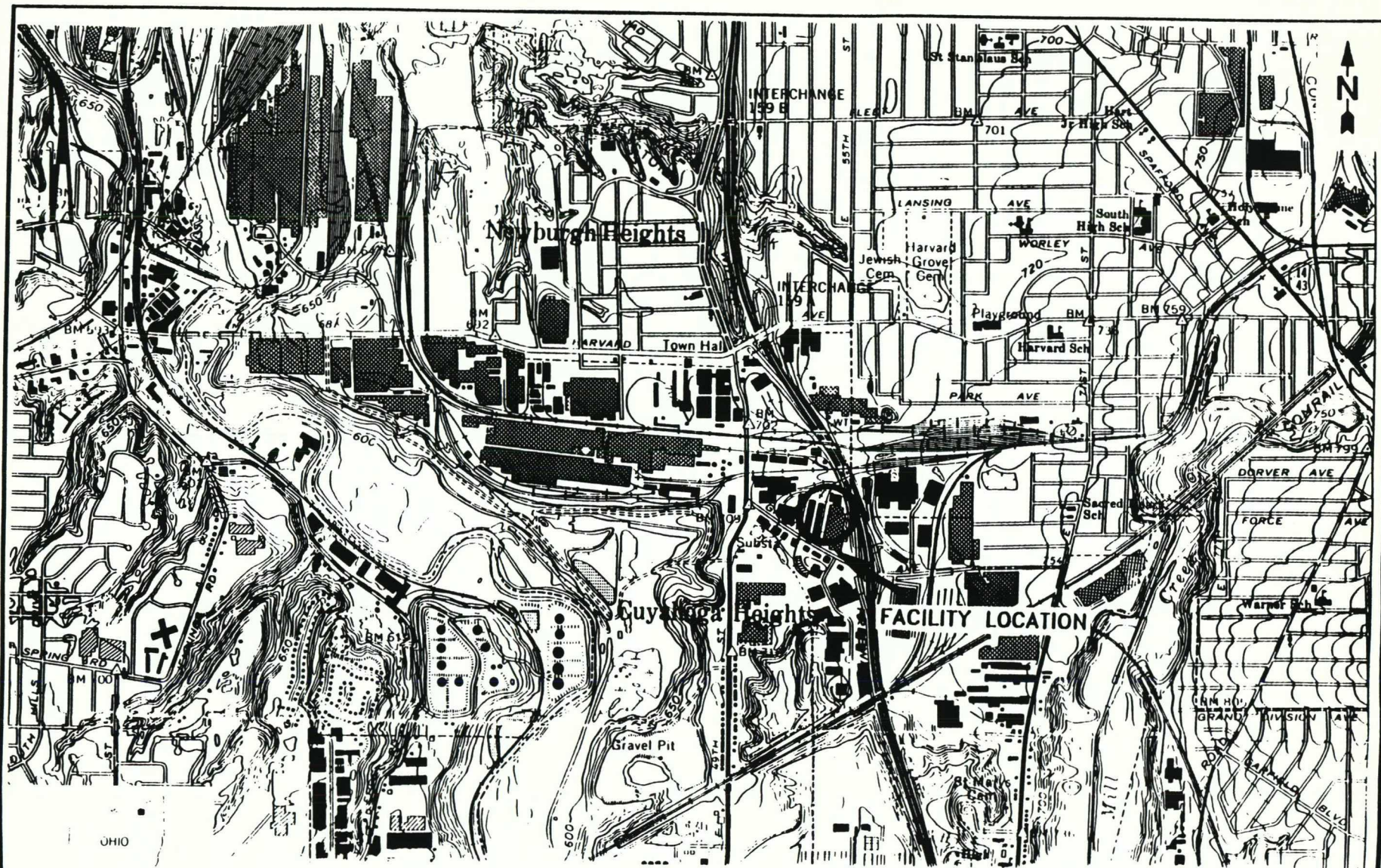
The SEP facility is located at 5201 Grant Avenue in Cuyahoga Heights, Cuyahoga County, Ohio. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°26'30"N and longitude 81°39'25"W). The facility occupies approximately 30,000 square feet (0.687 acres) in an industrial area.

The SEP facility is bordered on the north, east, and west by light industrial areas. Grant Avenue borders the facility on the south. The facility is accessed by an entrance to a parking lot off of Grant Avenue. An electrical security system controls access through doors and windows.

2.2 FACILITY OPERATIONS

The SEP facility currently operates two departments, plastisol and paint. The plastisol department is located near the south end of the building and produces plastisol synthetic resin, a nonflammable product used in the medical, tooling, construction, and other industries. The designation of the paint department name is a misnomer, and is the result of previous operations in the 1970s. The paint department is located in the northeast corner of the building. Approximately 90 percent (%) of the products produced in the paint department are solvent-based polyester laminate compounds. The remaining 10% are primers, reducers, and solvent-based paint. The powder department is located in between the plastisol and paint departments. Operations in this area ceased in 1988.

Plastisol is a dispersion of finely divided resin in a plasticizer. A typical composition is 100 parts resin to 50 parts plasticizer, forming a paste that gels when heated. A plasticizer is an organic compound which is typically added to a high-chain polymer both to facilitate processing and to increase the flexibility and toughness of the product. The plastisol process consists of initially introducing plasticizer, such as diisodecyl phthalate, palatinol 711, or sanitizer 141, and soybean oil into stainless steel mixing tanks that range in volume from 55 gallons to 1,500 gallons.



QUADRANGLE LOCATION

Source: Modified from USGS 1984

Former G.S. Plastics Company
Cuyahoga Heights, Ohio

FIGURE 1
FACILITY LOCATION

EMC ENVIRONMENTAL MANAGEMENT, INC.

Depending on the product desired, modifiers, stabilizers, and dispersion resins are added and blended. Pigments are also added depending on customer specifications. The material is tested for viscosity and put under vacuum to remove any bubbles or water remaining in the mix. The product is put into containers ranging in size from 5 gallons to 1,500 gallons. The plastisol department generates a solid waste consisting of bags of resin and a liquid hazardous waste consisting of a blend of aromatic 100 solvent and plasticizers. The hazardous waste is generated during washing of the mixing tanks with the aromatic 100 solvent. The hazardous waste generated from this process is stored in 55-gallon drums in the Hazardous Waste Drum Storage Area (SWMU 1).

In the paint department, the manufacturing process consists of introducing polyester or polyvinyl chloride resins and solvent into a mixing tank. The resins are supplied by Goodyear. The solvents used include methyl ethyl ketone (MEK), toluene, methyl isobutyl ketone (MIBK), and methylene chloride. The resins are blended together in various size mixers until the product is in solution form. The mixers are equipped with cooling coils to condense any solvents that vaporize. The final product is packaged into 55-gallon drums and shipped to customers. All scrap or off-specification product is recycled back into the process. The paint department does not produce any hazardous waste.

Previous operations included the formulating and compounding of injection and extrusion resin powders. These operations took place in the powder department. A silo located on the western side of the building was used for bulk storage of dispersion resin powders. Material in the silo was dispersed automatically to several tanks in the powder department. Operations in this area were discontinued in 1988. The powder production area is now used to store raw material in large tanks and empty 55-gallon drums. The resin/plasticizer separating drums and the Hazardous Waste Drum Storage Area (SWMU 1) are also located in the former powder production area.

Section 2.3 discusses in detail the solid wastes generated from facility operations, as well as the SWMUs where they are managed.

SEP has operated at this location under several different corporate names. Operations at the facility have remained essentially unchanged since the 1950s. SEP currently employs 11 people. In addition to the manufacturing plant, the facility includes a shipping dock and parking lots.

The facility laboratory is used for research and development and quality control of product. The lab has some small-scale testing equipment. The lab retains a small sample of each product made for a period of six months. The laboratory does not generate any hazardous waste.

The SEP facility has 16 aboveground storage tanks for storage of raw material. Three of the tanks contain fresh solvent and are located outside on the northeastern end of the facility property. A six-foot high fence is used to control access to these tanks. The remaining 13 tanks are located inside the facility. Seven of the 13 tanks are located in the powder department. Five tanks are located in the plastisol storage room. These tanks contain fresh plasticizer. One tank is located in the rear of the facility on the north end of the warehouse. This tank contains fresh methylene chloride.

The original building was constructed in 1947, when Klausner Cooperative used the site to make wooden barrels. G.S. Plastics started at the location in the 1950s. In 1970, G.S. Plastics merged with Custom Trim Products of Cuyahoga Heights, Ohio. Processes and products at that time included extrusion and powder compounding products, solvent-based paints, primers, and reducers. In 1977, Custom Trim Products was sold to Libbey Owens Ford (LOF) Company of Toledo, Ohio. The processes at the plant remained the same as in the 1970s.

In 1986, LOF was restructured, and the facility plant was named Sterling Engineered Products. During that time, the current process evolved. Extrusion compounding and almost all powder compounding ceased. In addition, the solvent-based polyester laminating compounding line was introduced as one of the paint department product lines. The LOF name was dropped and Trinova was created.

In 1988, the company changed the SEP name to Aeroquip, Automotive Products Group. After a legal question concerning that name, the Sterling Engineered Products name was reinstated.

2.3 WASTE GENERATING PROCESSES

The primary waste stream generated at the SEP facility is plasticizer mixed with spent aromatic 100 solvent, a naphtha-based solvent. The solvent and plasticizer mixture is hazardous and classified as a F003 waste. Solid wastes of cardboard and resin powder are also generated.

The resin and cardboard are nonhazardous. Wastes generated at the facility are discussed below. Annual generation rates are based on 1991 hazardous waste manifests.

Waste plasticizer and solvent are generated during the production of plastisol compounds. This waste is the result of washing the mixing tanks when cleanouts are necessary. During a cleanout, the mixing tanks are rinsed with aromatic 100 solvent to remove any residual plasticizer and resin and to prevent rust. Aromatic 100 solvent contains petroleum naphtha; 1,2,4-trimethyl benzene; xylene; and cumene. The waste resulting from the cleanout is stored in 55-gallon drums near the hazardous waste drum storage area (SWMU 1). Here the drums are allowed to sit so that the solvent and plasticizer can separate from the resin. When separated, the solvent and plasticizer are skimmed off the top and reused. Reusing solvent and plasticizer deteriorates the quality of the solvent and plasticizer. When only low quality product is left, no more solvent and plasticizer can be skimmed off the top and the drums are moved to the hazardous waste drum storage area (SWMU 1). Approximately 18 to 20 drums of the waste are generated annually. Approximately 1,265 gallons of waste was shipped to Hukill Chemical Corporation of Bedford, Ohio in 1991 (SEP, 1991a,b).

After a paint batch is made, the mixing tank is cleaned using solvent. The resulting solvent and paint mixture is recycled into low-performance or off-specification product. Solvents used in the paint department are MEK, toluene, methylene chloride, and MIBK. The solvents used during the mixing in the paint department are also used to clean the tanks after each run. The paint department does not produce any hazardous waste. Mixers in the paint department are also equipped with cooling coils that condense and return any vaporized solvents to the mixer.

The facility has several air emissions control devices. A baghouse collects dust from the plastisol mixing process. This dust contains resin and is recycled into the process. Occasionally bags of dust are discarded with other general refuse. Exhaust vents are located on each of the solvent mixing tanks in the paint department. The vents are connected to fans that exhaust solvent fumes from the room. The exhaust fans vent the fumes through pipes to the outside. The exhaust fans are permitted by the Bureau of Pollution Control, city of Cleveland. A silo and plastic powder mixing operation were also permitted by the Bureau of Pollution Control. These units ceased operation in 1988. The three aboveground storage tanks located outside are also permitted.

The facility does not have a National Pollutant Discharge Elimination System permit (NPDES). All wastewater is discharged to the Cleveland sanitary sewer.

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases to ground water, surface water, air, or on-site soils at the SEP facility.

During the VSI, dark oily stains were observed on the western wall and driveway of the facility. It was determined by the inspection team that the stains were the result of spills from tank trucks pumping plasticizer and soybean oil into storage tanks inside the building. According to material safety data sheets, neither the soybean oil or plasticizer contain any hazardous constituents listed in 40 CFR part 261 Appendix VIII. Consequently, it was presumed that no hazardous constituents had been released to environmental media and that this was not an area of concern.

Oily stains were noted on the floor of the plastisol storage room during the VSI. There was no visible evidence of a release to environmental media from the room during the VSI. Consequently, this was not an area of concern.

2.5 REGULATORY HISTORY

The facility submitted a Notification of Hazardous Waste Activity to EPA on October 21, 1980 (G.S. Plastics, 1980a). The notification listed the following hazardous wastes: F003 and F005. A second notification of hazardous waste activity was submitted on February 9, 1981 (G.S. Plastics, 1981). This notification listed only the following hazardous waste: F003. The facility submitted a RCRA Part A permit application on November 17, 1980 (G.S. Plastics, 1980b). The application listed the following process code and capacity: S01 (2,000 gallons). The S01 code referred to the former hazardous waste drum storage area (SWMU 3). The application listed the following waste: D001. Facility representatives stated that OEPA advised the facility to list the waste as D001 instead of F003 (Brazytis, 1992a). Based on tests conducted by Hukill Chemical

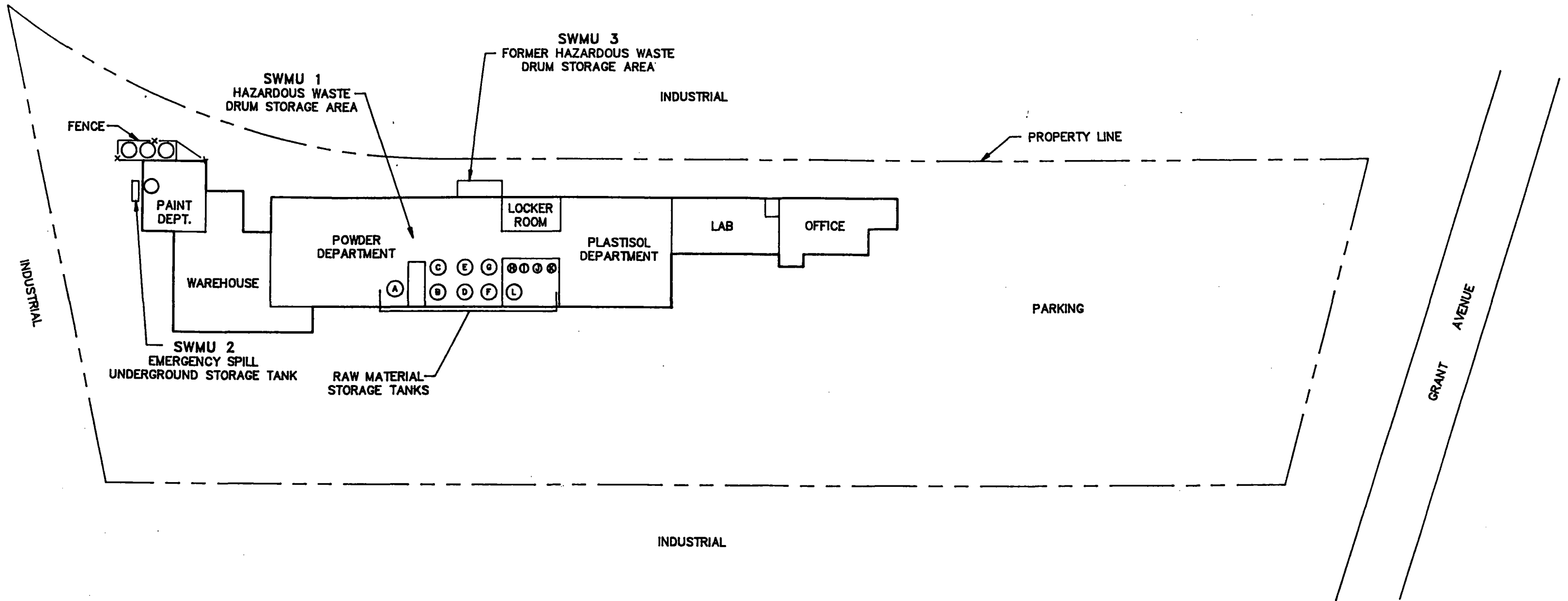
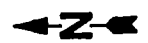
TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit^a	Status
1	Hazardous Waste Drum Storage Area	No	Active
2	Emergency Spill Underground Storage Tank	No	Active
3	Former Hazardous Waste Drum Storage Area	Yes	Inactive

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Plasticizer-solvent-resin mixture/ D001, F003	Plastisol Department	1 and 3
Solvents/D001, F003, F005	Accidental Releases	2



NOT TO SCALE

FORMER G.S. PLASTICS COMPANY CUYAHOGA HEIGHTS, OHIO
FIGURE 2 FACILITY LAYOUT
PNC ENVIRONMENTAL MANAGEMENT, INC.

GS-PLASZ.DWG - 08/16/92 - CTR - 008-CSS0870424

SOURCE: MODIFIED FROM G.S. PLASTICS, 1992

Corp., the facility has been instructed by Hukill Chemical to list the waste as F003 on manifests, rather than D001 (Brazytis, 1992b).

On July 12, 1982, EPA submitted a letter to the facility indicating that it appeared to qualify as a small quantity generator. In addition, EPA requested a written determination of the facility's status and that the facility withdraw its Part A permit application if it did not store waste on site for more than 90 days (EPA, 1982). On April 13, 1982, G.S. Plastics informed EPA of a change on their Part A permit application, stating that the S01 process code capacity of storage in containers had been changed from 2,000 gallons to 220 gallons (G.S. Plastics, 1982). On July 8, 1983, G.S. Plastics submitted a letter to EPA requesting a change in status to that of generator accumulating waste onsite for less than 90 days (G.S. Plastics, 1983). On September 27, 1984, EPA notified the facility that OEPA informed the agency that the facility was no longer operating as a storage facility. Consequently, EPA changed the status of the facility to that of a generator storing hazardous waste for less than 90 days (EPA, 1984).

The facility was not required to close the hazardous waste drum storage area (SWMU 1) under formal RCRA closure. The facility currently operates as a small quantity generator storing hazardous waste on site for less than 90 days. The facility has not had RCRA compliance problems in the past.

The facility has several air emissions control devices. Exhaust vents are located on each of the solvent mixing tanks in the paint department. The vents are connected to fans that exhaust solvent fumes from the room. The exhaust fans are permitted by the Bureau of Pollution Control, city of Cleveland. A silo and plastic powder mixing operation were also permitted by the Bureau of Pollution Control. These units ceased operating in 1988. The three aboveground storage tanks located outside are also permitted. No violations of the facility's air permits were identified.

The facility has no history of odor complaints from area residents. The facility has no history of CERCLA activity.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the SEP facility.

2.6.1 Climate

The climate in Cuyahoga County is continental. The average daily temperature is 50°F. The lowest average daily temperature is 27°F in January. The highest average daily temperature is 72°F in July. In summer, northern areas nearest Lake Erie are markedly colder than the rest of the county. The average relative humidity in mid-afternoon is about 60 percent. The total average annual precipitation for the county is 35 inches. The mean annual lake evaporation is about 31 inches (U.S. Geological Survey [USGS], 1978). The 1-year, 24-hour maximum rainfall is 4 inches. The prevailing wind is from the southwest. Average wind speed is highest in January at 13 miles per hour from the southwest (U.S. Soil Conservation Service, [USSCS] 1980; and National Oceanic and Atmospheric Administration, 1990).

Precipitation is well distributed during the year. Sixty percent of the total annual precipitation usually falls from April to September. Snow squalls are frequent from late fall through winter, and total snowfall normally is heavy. Crop development early in the growing season is slowed by frequent cool winds from Lake Erie. Fall winds that blow from a relatively warm Lake Erie delay the first fall freeze and prolong the growing season for all crops. The average growing season in Cuyahoga County is about 225 days (USSCS, 1980).

2.6.2 Flood Plain and Surface Water

Surface waters at the site drain into a combined storm sanitary-sewer system operated by the city of Cleveland. The surface water runoff that drains into this system is treated by the Southerly publicly owned treatment works (Brazytis, 1992b). Off-site surface waters also drain into this system. The nearest surface waters are the Cuyahoga River and Ohio Canal, located approximately 0.5 miles southwest; Mill Creek, approximately 1.0 mile east; and Burk Branch, approximately 0.75 miles north of the facility. All these surface water bodies are used for recreation. The Ohio Canal no longer is used for transportation, but provides water for industrial use. The Cuyahoga River discharges to Lake Erie. Mill Creek and the Ohio Canal discharge to the Cuyahoga River. Burk Branch is an intermittently flooded water body and has no discharge point. Lake Erie is located approximately 5.0 miles northwest of the facility. The facility is not located in the 100-year flood plain (U.S. Geological Survey, 1974).

2.6.3

Geology and Soils

Site-specific geology and soil information is not available; therefore, regional information is presented. The SEP facility is located in the approximate center of Cuyahoga County. Cuyahoga County is located in two physiographic provinces: the glaciated Allegheny Plateau of the Appalachian Plateau Province to the south and east, and the Eastern Lake and Till Plains section of the Central Lowland Province to the west and north. The line of demarcation between the two provinces is the Portage Escarpment, which runs northeast to southwest, just north of Cleveland. Topography in the Allegheny Plateau is characterized by mature river valleys, while the Central Lowland topography is controlled predominately by thick glacial deposits. Bordering Lake Erie is the Lake Plain area, a narrow strip averaging 4 miles in width and composed of lacustrine and beach ridge deposits (Cushing, Leverett, and Van Horn, 1931; White, 1982).

Two general classes of deposits exist: glacially derived, unconsolidated deposits of Quaternary age and consolidated sandstone and shale of Paleozoic age (Cushing, Leverett, and Van Horn, 1931; White, 1982). Specific glacial units discussed will not be correlated to a specific lobe, because several of the units were synchronous deposits and have the same general characteristics.

Glacial outwash deposits of sand and gravel, located predominately in valleys and on valley sides, are found with the glacial deposits. The majority of glacial deposits are heterogeneous, and may contain discontinuous lenses and thin sheets of sand and gravel (White, 1982). Glacial deposits in the area range in thickness from 0 to 300 feet. South of the Lake Plain area, the upper most unit, the Hiram Till, is exposed. The Hiram Till is a clay till that ranges in thickness from 0 to more than 30 feet. The Kent-Navarre Till underlies the previous unit and is composed of clayey sand and silt that ranges in thickness from 0 to 100 feet. The last Wisconsinan age unconsolidated unit in the area is the Mogadore-Millbrook Till, which is also composed of clayey sand and silt (Banks and Feldmann, 1970; White, 1982). Pre-Wisconsinan age tills and outwash deposits unconformably overlie the bedrock in deep depressional surfaces, such as buried bedrock valleys (White, 1982).

The bedrock units dip slightly to the south and south-southeast at about 20 feet per mile (Cushing, Leverett, and Van Horn, 1931). Devonian age bedrock is exposed in the subcrop and along river valleys along Lake Erie. The uppermost bedrock unit is the Sharon Conglomerate of the Pottsville Group of Pennsylvanian age. It is approximately 0 to 150 feet thick. Underlying this unit is the Cuyahoga Group of Mississippian age, which is approximately 160 to 425 feet

thick and is composed primarily of blue to gray shale, with alternating beds of sandy shale and sandstone (Williams, 1940). Underlying the Cuyahoga Group is the Berea sandstone, which ranges in thickness from 5 to 150 feet. The Berea Sandstone overlies the Bedford shale, which is composed of firm-to-soft gray siliceous shale, ranging in thickness from 50 to 90 feet. This formation overlies the Ohio Shale of Devonian age, which is more than 400 feet thick. The Ohio Shale formation is predominately black carboniferous shale, with beds of greenish-gray shale. The Cleveland and Chagrin shales are members of the Ohio Shale formation. Underlying this unit is a series of older Paleozoic era limestones, sandstones and shales (Cushing, Leverett, and Van Horn, 1931; Banks and Feldmann, 1970; White, 1982).

The soil association under the area around the facility is called Urban Land. Urban Land consists of nearly level and gently sloping areas covered by asphalt, concrete, buildings, and other impervious surfaces such as parking lots, shopping and business centers, and industrial parks. It occurs mainly in the downtown business district and in corridors along main roads and streets. This soil association consists of about 80 percent of Urban Land and 20 percent soils of minor extent. Minor soils in these areas are the Mahoning, the Mitwanga, the Elnora, the Oshtemo, and the Allis soils. Some areas contain miscellaneous materials such as dredgings and industrial wastes. Sloping to steep areas are located along the Cuyahoga River (USSCS, 1980).

2.6.4 Ground Water

Site-specific ground water information was not available; therefore, regional information is presented. Regional ground-water information indicates that in certain local areas, the Ohio and Bedford shales underlying this site are completely unproductive of ground water. Generally, however, domestic supplies of 3 to 4 gallons per minute (gpm) may be developed, although such wells may have to be deeper than wells of corresponding yields in other aquifers (Winslow, 1952). Regionally, the use of ground water in Cuyahoga County is limited to water-bearing formations within the bedrock, alluvial and glacial outwash deposits found mostly in valleys, and to a lesser extent, sand and gravel lenses and sheets associated with glacial drift. Existing valleys generally contain thick deposits of sand and gravel from glacial outwash. Wells in these deposits can yield up to 500 gpm. The glacial outwash has an estimated hydraulic conductivity of 10^{-3} to 10^{-1} centimeters per second (cm/sec) (Bloyd, 1974; Fetter, 1988).

The glacial deposits also may be a source of ground water where the deposits overlie the Ohio Shale, especially where the drift is thick and contains a large percentage of sand (Cushing,

Leverett, and Van Horn, 1931). The hydraulic conductivity for such aquifers is estimated to be less than 10^{-3} cm/sec. Water-bearing formations within the Paleozoic bedrock include the Sharon Conglomerate and Berea Sandstone. Both aquifers have an estimated hydraulic conductivity greater than 10^{-3} cm/sec (Bloyd, 1974). The Sharon Conglomerate is reported to have yields as much as 125 gpm, but domestic wells normally yield about 10 gpm. The Berea Sandstone yields as much as 20 gpm for domestic wells and 250 gpm for larger wells (Winslow, 1952). Generally, local ground-water flow in shallow glacial aquifers is controlled by surface topography and discharges into nearby rivers or lakes. The regional ground-water flow in the bedrock most likely is toward the Appalachian Basin to the south (Bloyd, 1974).

2.7 RECEPTORS

The facility occupies approximately 30,000 square feet in an industrial area of Cuyahoga Heights, Ohio. The population of Cuyahoga Heights is approximately 640 people. The population of Cleveland which surrounds Cuyahoga Heights is approximately 530,000 (U.S. Department of Commerce, 1988).

The facility is bordered on the east, north, and west by light industry. The facility is bordered on the south by Grant Avenue. An entrance through a parking lot off Grant Avenue provides access to the facility. An electrical security system controls access through windows and doors. There are 11 people working at the facility. The nearest school is the Sacred Heart School located approximately 0.75 miles east of the facility. The active waste management unit (SWMU 1) is inside the building. Only SEP personnel have access to the unit. SWMU 2 is located outdoors. SWMU 3 is also outdoors but inactive.

The nearest surface waters are the Cuyahoga River and the Ohio Canal, located approximately 0.5 miles southwest; Mill Creek, located approximately 1.0 mile east; and Burk Branch, located approximately 0.75 miles north of the facility. All these surface water bodies are used for recreation. The Ohio Canal no longer is used for transportation, but provides water for industrial use. The Cuyahoga River discharges to Lake Erie. Mill Creek and the Ohio Canal discharge to the Cuyahoga River. Burk Branch is an intermittently flooded water body and does not have a discharge point. Lake Erie is located approximately 5.0 miles northwest of the facility. Ground water is not used for drinking water, or for industrial, agricultural, or municipal supply water. The site has neither injection or withdrawal wells. Cuyahoga Heights and the surrounding

area obtain drinking water from the city of Cleveland; Cleveland obtains its water supplies from Lake Erie.

There are no sensitive environments on site. There are no state or national parks located within 2.0 miles of the facility. The nearest wetlands are associated with three nearby surface waters: Cuyahoga River; Ohio Canal; and Mill Creek. One wetland approximately two acres in area is located approximately 0.5 miles southwest of the facility near the Ohio Canal. A second wetland approximately one acre in area is located approximately 0.5 miles south of the facility. These two wetlands are classified as palustrine, open water/unknown bottom, with an intermittently exposed/permanent water regime. Another wetland associated with the Cuyahoga River is located along its banks and is classified as riverine, lower perennial, open water/unknown bottom, with an intermittently exposed/permanent water regime. A fourth wetland 3 to 4 acres in area is located 0.5 miles southwest of the facility and is classified as palustrine, with emergent and shrub/scrub broad-leaved deciduous vegetation and a saturated/semipermanent/seasonal water regime. A fifth wetland approximately one acre in area, located 1.0 mile south/southeast is classified as palustrine with shrub/scrub broad-leaved deciduous vegetation and a saturated/semipermanent/seasonal water regime. Another wetland associated with Mill Creek is located along the banks of the creek and is classified as palustrine, forested with broad-leaved deciduous vegetation and an intermittently flooded/temporary water regime (U.S. Department of the Interior, 1977).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations.

SWMU 1

Hazardous Waste Drum Storage Area

Unit Description: The unit consists of an area 6-feet wide by 10-feet long inside the powder department. The floor of the unit is concrete. There are no floor drains near the unit.

Date of Startup: The unit began operation in May 1982.

Date of Closure: The unit is active.

Wastes Managed: The unit manages aromatic 100 solvent mixed with plasticizers (D001, F003). The waste is transported off site by Hukill Chemical.

Release Controls: The unit is inside a building on a concrete floor. The building and concrete floor act as secondary containment. A locker containing spill control equipment and supplies is located next to the unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit appeared in good condition at the time of the VSI. The concrete floor was sound, with no cracks. There was no evidence of spills in the area. Drums in the unit were labeled and in good condition with no rust or leaks (see photograph no. 1).

SWMU 2

Emergency Spill Underground Storage Tank

Unit Description: The unit consists of a 250-gallon underground steel tank. The tank is located outside against the north wall of the paint department. A

4-foot high concrete containment wall is approximately 3-feet north of the tank. The area surrounding the tank and between the containment wall and building contains soil or fill dirt. There is no containment or floor beneath the tank. The tank is connected to the drain from the sump in the paint mixing room. The tank is designed to contain material that is spilled in the paint department room and drains into the sump.

Date of Startup: The unit began operation in September 1980.

Date of Closure: The unit is active.

Wastes Managed: The unit is designed to manage spills of plasticizer-solvent-resin mixture (F003) and solvent mixed with polyester or polyvinyl resins (D001, F005). Since a release has never occurred at this unit, no waste has ever been removed for disposal. File reviews and interviews with facility representatives did not reveal which facility would dispose of the waste.

Release Controls: The tank is underground. The tank is bordered on the south by the manufacturing building and on the north by a concrete containment wall. No other containment exists beneath the tank or to the east and west. There is no leak detection for this unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: The unit was underground; consequently, the condition of the tank could not be observed. Associated piping leading from the building wall to the tank appeared to be in good condition, with no signs of rust or leaks. However, the remainder of the piping run that led under the building was not visible. Shrubs and grasses were growing on the ground above the tank. There was no evidence of

releases on the north side of the containment wall (see photograph nos. 2 and 3).

SWMU 3

Former Hazardous Waste Drum Storage Area

Unit Description:

The unit consists of an area 6-feet by 15-feet outside the east wall of the powder department. The unit was on a concrete surface. There were no drains near the unit. The unit was used to store 55-gallon drums of hazardous material. The capacity of the area was approximately 36 drums.

Date of Startup:

The unit began operation in June 1976.

Date of Closure:

The unit ceased operation in May 1982.

Wastes Managed:

The unit managed waste plasticizer mixed with solvent (D001, F003, and F005). Information regarding the ultimate disposition of the waste was not found during the PA/VSI.

Release Controls:

The unit is outside the building on a concrete surface. No other containment exists.

**History of
Documented Releases:**

There have been no documented releases from this unit.

Observations:

The unit consisted of an open concrete area east of the building. There were no markings to signify the boundaries of the unit. There were no cracks in the concrete. There was no evidence of any releases having occurred (see photograph no. 4).

4.0 AREAS OF CONCERN

PRC did not identify any AOCs during the PA/VSI.

RELEASED
DATE 4/16/99
RIN # 639-99
INITIALS WV

ENFORCEMENT
CONFIDENTIAL

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified three SWMUs and no AOCs at the SEP facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 summarizes the SWMUs at the SEP facility and recommended further actions.

SWMU 1 Hazardous Waste Drum Storage Area

Conclusions: The unit consists of an area 6-feet wide by 10-feet long inside the powder department. The floor of the unit is concrete. The unit has a low potential for release to ground water, surface water, air, or on-site soil. The unit is indoors and has adequate containment. There are no floor drains near the unit. There has been no history of documented releases from this unit.

Recommendations: PRC recommends no further action at this time.

SWMU 2 Emergency Spill Underground Storage Tank

Conclusions: The unit consists of a 250-gallon underground steel tank. The tank is located outside by the north wall of the paint department. The tank is designed to contain material that is spilled in the paint department room and drains into the sump. The unit has a low potential to release to surface water and air.

Ground water: Low to moderate. There has been no history of documented releases from this unit. However the integrity of the tank and piping is unknown.

RELEASED
DATE 9/16/99
RIN # 039-99
INITIALS mv

ENFORCEMENT
CONFIDENTIAL

TABLE 3
SWMU SUMMARY

	<u>SWMU</u>	<u>Dates of Operations</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1.	Hazardous Waste Drum Storage Area	1982 to Present	None	No further action
2.	Emergency Spill Underground Storage Tank	1980 to Present	None	Conduct leak testing to determine integrity of the tank and piping
3.	Former Hazardous Waste Drum Storage Area	1976 to 1982	None	No further action

**ENFORCEMENT
CONFIDENTIAL**

RELEASED
DATE 4/11/99
RIN # 639699
INITIALS WW

On-site soil: Low to moderate. There has been no history of documented releases from this unit. However the integrity of the tank and piping is unknown.

Recommendations: PRC recommends that the tank and piping be tested for leaks.

SWMU 3 Former Hazardous Waste Drum Storage Area

Conclusions: The unit consists of an area 17-feet by 50-feet outside the building against the east wall of the powder department. The unit was on a concrete surface. The unit was used to store 55-gallon drums of hazardous material. The area is currently inactive. The unit has a low potential for release to ground water, surface water, air, or on-site soil. There was no visible evidence of a release during the VSI and there has been no history of documented releases from this unit.

Recommendations: PRC recommends no further action at this time.

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Williams, Arthur B., 1940. Geology of the Cleveland Region Pocket National History No. 9 Geological Series No. 1, November.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH 02 SITE NUMBER OHD 980 569 289

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
Sterling Engineered Products (Formerly G.S. Plastics)

02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
5201 Grant Avenue

03 CITY
Cuyahoga Heights

04 STATE
OH

05 ZIP CODE
44125

06 COUNTY
Cuyahoga

07 COUNTY
CODE
18

08 CONG
DIST

09 COORDINATES: LATITUDE
41°26'30"N

LONGITUDE
81°39'25"W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take Interstate 77 south to Grant Avenue exit. Go west on Grant Avenue. The facility is on the right.

III. RESPONSIBLE PARTIES

01 OWNER (if known)
William Munkacsy

02 STREET (Business, mailing, residential)
3000 Brementon Road

03 CITY
Pepper Pike

04 STATE
OH

05 ZIP CODE
44124

06 TELEPHONE NUMBER

07 OPERATOR (if known and different from owner)
Sterling Engineered Products

08 STREET (Business, mailing, residential)
5201 Grant Avenue

09 CITY
Cuyahoga Heights

10 STATE
OH

11 ZIP CODE
44125

12 TELEPHONE NUMBER
(216) 641-6340

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: _____
(Agency Name)

☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____
(Specify)

☐ G. UNKNOWN

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3010 DATE RECEIVED: 10/21/80
MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ ☐ C. NONE
MONTH DAY YEAR

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

☐ A. EPA

☒ B. EPA CONTRACTOR

☐ C. STATE

☐ D. OTHER CONTRACTOR

☒ YES

DATE 05/20/92

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER: _____

(Specify)

☐ NO

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1950s | present
BEGINNING YEAR ENDING YEAR

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous substances on site include aromatic 100 solvent mixed with plasticizer (D001, F003).

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The potential hazard to environment and/or population is low.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☒ C. LOW

(Inspect on time-available basis)

☐ D. NONE

(No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT
Kevin Picard

02 OF (Agency/Organization)
U.S. EPA

03 TELEPHONE NUMBER
(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT
Shoaib Mahmud

05 AGENCY

06 ORGANIZATION
PRC

07 TELEPHONE NUMBER
(703) 883-8649

08 DATE
08/26/92
MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

**Sterling Engineering Products
Cuyahoga Heights, Ohio
OHD 046 200 879**

Date: May 20, 1992

Facility Representatives: Vince Brazytis, Sterling Engineered Products, Plant Manager
(216) 641-6340

Inspection Team: Shoaib Mahmud, PRC Environmental Management, Inc.
Tom Sinski, PRC Environmental Management, Inc.

Photographer: Tom Sinski, PRC

Weather Conditions: Sunny, clear skies, temperature about 65°F

Summary of Activities: The visual site inspection (VSI) began at 9:05 a.m. with an introductory meeting. The inspection team discussed the purposes of the VSI and the agenda for the visit. Vince Brazytis, the facility representative, then discussed the facility's past and current operations, the solid wastes generated, and release history. Most of the information was exchanged through a question-and-answer format. Mr. Brazytis provided the inspection team with copies of documents requested.

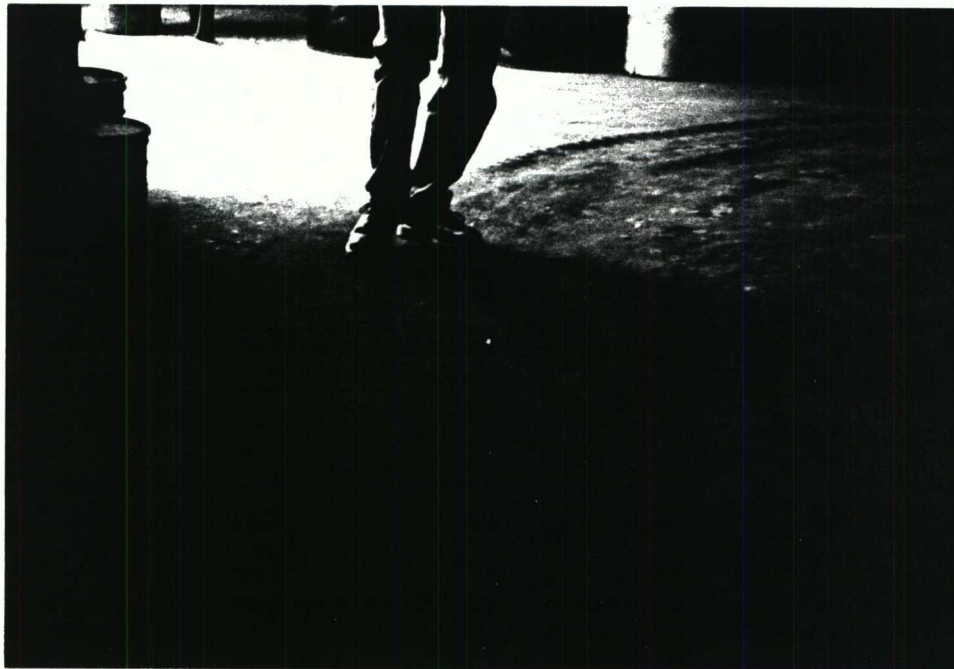
The VSI tour began at 11:15 p.m with the inspection team viewing the tank farm at the northern end of the facility. The tour proceeded to the emergency spill containment tank, also located at the northern end of the facility, outside the paint department. The team then proceeded to the western side of the facility, where the team observed the bulk product delivery station. Staining was observed on the walls and concrete surface near the station. Mr. Brazytis then escorted the inspection team to the laboratory area located at the southern end of the facility.

The tour proceeded indoors to the laboratory area, where the team observed equipment used for quality control and research development purposes. Mr. Brazytis proceeded to lead the tour through the plastisol department. The team observed the mixing area. The tour continued through the powder department, where the team observed 55-gallon drums and one 1,500-gallon mixer. The tour continued through the rear warehouse and to the paint department. The team observed mixers in this department. At 12:20 p.m., the tour concluded. Tom Sinski and Shoaib Mahmud had left the facility to purchase a disposable camera. They arrived at 12:48 p.m. to take photos and conclude with a wrap-up meeting. At 1:00 p.m. the inspection team held an exit meeting with Mr. Brazytis. The VSI was completed and the inspection team left the facility at 1:21 p.m.

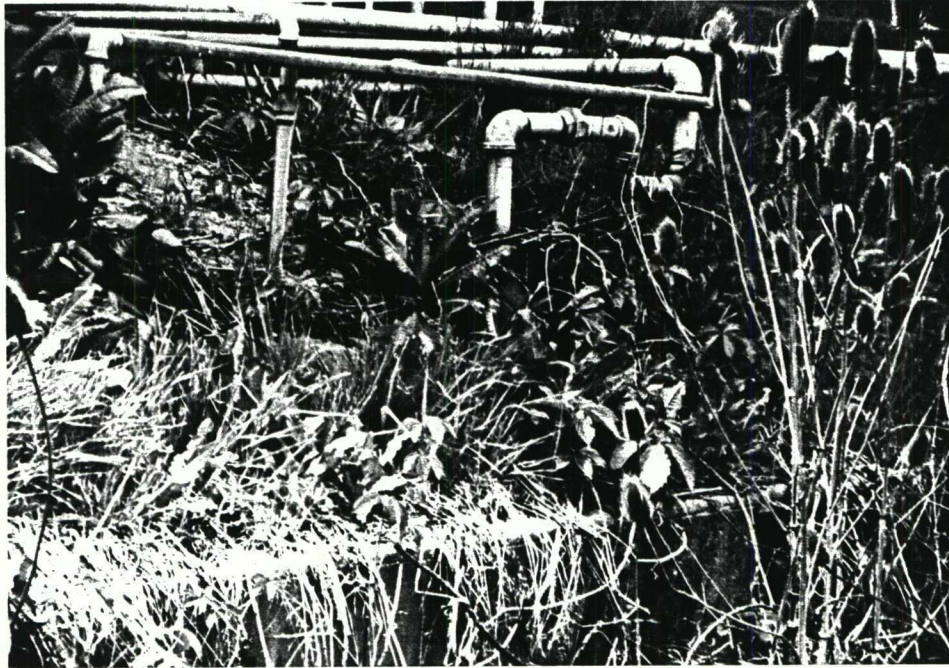
PRC took nine photographs of the facility; four are included in this attachment. The other five photographs were not included because they either developed poorly or were taken of areas determined later to not be AOCs.



Photograph No. 1 **Location:** SWMU 1
Orientation: West **Date:** May 20, 1992
Description: Photograph shows the hazardous waste storage area. A locker with spill containment material is to the left. A resin/plasticizer separating drum is shown in the background.



Photograph No. 2 **Location:** SWMU 2
Orientation: South **Date:** May 20, 1992
Description: Photograph shows the grate over the drain leading to SWMU 2.



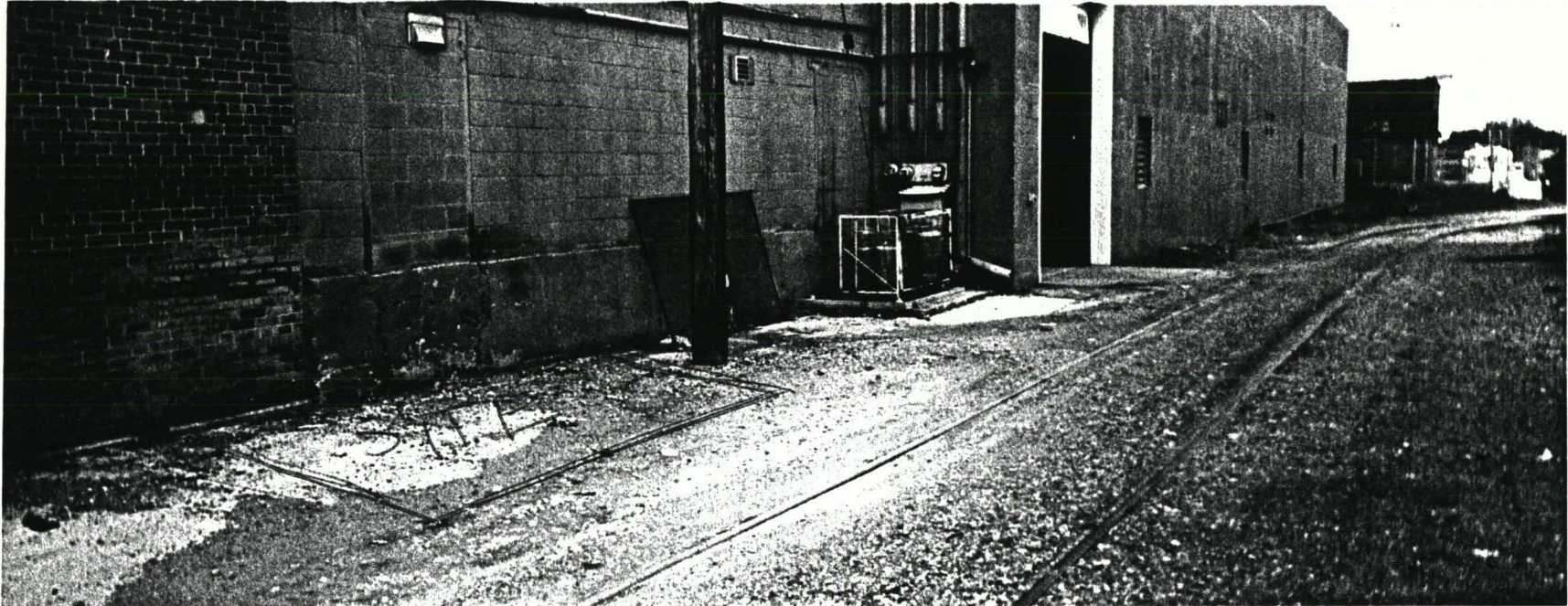
Photograph No. 3

Orientation: South

Description: Photograph shows the piping leading to SWMU 2. The piping consists of an inlet and vent pipe. The pipes at the top of the photograph are vent pipes from inside the building.

Location: SWMU 2

Date: May 20, 1992



Photograph No. 4
Orientation: Northwest
Description: Photograph shows the former hazardous waste drum storage area (SWMU 3).

Location: SWMU 3
Date: May 20, 1992

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

(97) Tom Sinski

5/20/92

CHD 980 568 289

G S PLASTICS VSI

9:00AM ARRIVE WITH SHEP.B. HARRIS

WEATHER: SUNNY, CALM 70'S

MET WITH VICE PRESIDENT

PLAST MANAGER FOR STERLING
PRODUCTS.

History: 1970 facility called

G S PLASTICS. Bldg MAY HAVE

been built in 1940'S. Prior

to G S PLASTICS facility was

called KLAUSON COOPERATIVE OFFICE

MAY DRUMS. PROCESSES IN

1970'S INCLUDE EXTRUSION COMPOUNDING

SOLVENT BASED PRIMER AND

REDUCED EXTRUSION COMPOUNDING

MIXING OF EXTRUSION COMPOUNDS +

ADDITIVES. MIXED AT HIGH SPEEDS

AND 200°F. CURRENT OPERATIONS

(98) T.H.

CONSIST OF COMPOUNDING PLASTICS,
INDUSTRIAL PAINTS AND COATINGS,

AND ADHESIVES, AND SOLVENT

BASED POLYESTER LAMINATING
COMPOUNDS. RAW MATERIAL COMES

AS A POLYESTER SLAB FROM
GEODYNE. IT IS DILUTED

WITH MEK, TOLUENE METHYLENE

CHLORIDE AND ~~SOLVENTS~~ TO PUMPED

INTO DRUMS AND SHIPPED TO

CUSTOMERS.

PAINT DEPARTMENT

MIXERS ARE EQUIPPED COOLING

COILS TO CONDENSE SOLVENT VAPORS.

SOLVENTS MEK, TOLUENE, MIBK,

IN PAINT DEPT ARE USED TO

CLEAN MIXING BLANDS. THE

WASTE SOLVENT IS RECYCLED

INTO LOW END PAINT PRODUCT.

99 T.S.

Plastisac DotAT:

Paint Dept: Co polyster
ADHESIVES, SWIMMING POOL
PAINTS, PRIMERS, REDUCERS.
REDUCERS CONSISTS MOSTLY OF
SOLVENTS, SOAKS TO EXTEND LIFE
OF THE PRODUCT (PRIMER). Co polyster
MIXED BY MIXING RAW POLYESTER
WITH SOLVENTS. ALL CLEANING
WASTES ARE RECYCLED INTO LOW
PERFORMANCE PRODUCT. ALL SCRAP
OR OFF SPEC MATERIAL ALSO RECYCLED
INTO THE PRODUCT.

9:43 AM

7.2





















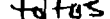



Plastisol Dext. products
tool dipping compounds, finishing
Lign products PRODUCE PLASTISOLS
for coatings AND MANY OTHER

SPECIALTY APPLICATIONS,
PLASTICS PRODUCTS IN MEDICAL,
FISHING INDUSTRIES. ETC.

PLASTIC HAS DIFFERENT ingredients.

Plastic process: 1) Mixing
units, made of carbon or stainless
steel. And plasticizer (DOP
~~Di-oxyl~~
Di-oxyl
phthalate)
Soybean oil,

ADD STABILIZERS, MODIFIERS,
BLEND FOR SHORT TIME (15 sec)
ADD DISPERSION RESIN. Dispersion
RESIN SUPPLIERS: BF Goodrich, Occidental
AND GOODYEAR.

<p>  </p>	<p>  </p>	<p>  </p>	<p>  </p>
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ROBINUS BLEND Low 15 minutes
BATCHES CAN RANGE FROM 5 gallons
to ¹⁵⁰⁰~~5000~~ gallons.

Can add pigment if necessary

(161)

T.2

CHECK VISCOSITY. THEN
 VACUUM OR DEGASSATION TO
 REMOVE AIR BUBBLES AND H₂O
 IN THE MIX. THEN PRODUCT
 IS PUT INTO CONTAINERS OF
 DIFFERENT SIZE (STANDARD, 55
 GALLON DRUMS, OR TOTES).
 WASTES GENERATED FROM CLEANING
 MIXERS WITH SOLVENT (AROMATIC
 100). RINSE THEN WITH PLASTICIZER
 TO PREVENT RUST. MIXES WITH SOLVENT
 UNTIL NO LONGER EFFECTIVE. CLEANING
 WASTES ARE PLACED IN 55-GALLON
 DRUMS SO SOLVENT AND PLASTICIZER
 RESIDUE CAN SEPARATE. SOLVENT
 IS SKIMMED OFF THE TOP AND
 REUSED. WHEN NO MORE SOLVENT
 CAN BE SKIMMED DRUMS ARE
 SHIPPED TO ECOLIN HOKILL CHEMICAL

(162)

T.2

10 TO 20 DRUMS PER YEAR
 CLASSIFIED AS D001 UOW.
 FORMERLY CLASSIFIED AS F003.
 WASTES ARE DUST FROM DISPERSION
 REACTORS IS COLLECTION IN DUST
 COLLECTIONS. THE DUST COLLECTED
 IS RECYCLED BACK INTO LOW
 END PRODUCTS.

RESINS COME IN 50 LB SACKS.
 THEY ARE IN DRY SOLID FORM.
 OTHER RAW MATERIALS ARE EITHER
 IN BULK SHIPMENT OR TOTES.

WASTE DRUMS ARE STORED IN
 NUMEROUS WASTE DRUM STORAGE
 ALONG TOTAL CAPACITY.

(103)

T.L.

Facility has 3 ABOVE-GROUND
Storage tanks outside AND
12 Storage tanks INSIDE.
Outside tanks store RAW
SOLVENTS (MOK, TOLUENE, MIBK)
14 Tanks are usually not
filled to capacity for
SAFETY AND COST REASONS.
All tanks are raw material
Storage.

Permits: Air permits for
mixing tanks AND solvent
storage tank.
Like permit and plastic
powder ^{mixer} permit revoked.

Operations ceased in 86-87
for S.L. and 12/88 for
the plastic powder mixer

T.L.

(104)

Spill occurred in 70's as
the result of vandalism. Occurred
INSIDE the building. Approximately
200 gallons.

Facility employs 11 people.
Approximately 30,000 FT². All
floors drains, drain into
COMBINED SEWER SYSTEMS.
All plugged as of 4/90 91.
Facility is on city water
supply. No wells on-site.
Some water used for cooling
Injection mixers. Water system
is closed, no wastewater
generator.

Regulatory status new.
Small quantity generator.

(105) T.L.

T.L. 106

10:47 AM Requested with denial.
of Phase II in 1983 or 1984.

Probably I.L.O.S. as a
protective I.L.O.S. NOVEL

Normally closed NOX SWMUS.

At 1984 letter from EPA

stating that their status
is that of a generator
storing less than 90 days.

SWMUS. HAZARDOUS waste
from storage area ~ 1983
Prior to 1983. Drums were
consolidated in plastic drum
and shipped out.

No history of complaints
from area residents.

11:06

Railroad - Newburg and then
Lynch then - used by HE
for repairing Diesel engines.

11:10 TOUR

Silo - used for storage
of suspension resin.
Solvent tank farm. Store
product solvent. Area is
fenced. Tanks are in
cinder block containment
area. Cinder block walls
approximately 4 feet high.
Tanks are in good condition.
Tanks are vented to the
roof.
A fuel tank located on
the north side. Tank is
used to contain any

(10) 1

11:20 spill that occur in the paint building & spill would go through floor joints and into the tank. Tank capacity is 200 gallons. Tank is in the ground surrounded on the north by a 3 foot concrete wall. No other containment around the tank. A spill has never occurred in 22 years since Vince B. Has been working.

WLA-B side of Bldg. 20
PRODUCT BULK DELIVERY station
SOME BLACK STAINING on wall,
possibly from DUST OF HANG.

LAD: FLAMMABLE CAB. 203 WITH

11:45 RAW MATERIAL AND RETAINED PRODUCTS, (15)

LAD HAS SOME SMALL SCALE TESTING EQUIPMENT. FLOOR DRAINS ARE PLUGGED

PLASTISOL MIXING AREA
DRAINS ARE GRASKED AND PLUGGED.
PLASTISOL STORAGE AREA SOME STAINING on floor. MATERIAL IS DUMPED THROUGH THE WALL.
RAW MATERIAL STORAGE AREA
SOME STAINING on floor.

Hazardous waste storage area.
8 drums to be shipped. Drums are labeled. Drums are in good condition. No leaks. Spill kit nearby.

(109)

T.S.

11:51

PLASTIC MIXING TANK.

A DEGRATER, DEGRATER

IS VENTED TO OUTSIDE.

EMISSIONS ARE NOT HAZARDOUS
AND SOLVENTS OR GASES.RESIN PRODUCT ON THE
FLOOR.

PAINT ROOM. METHYLENE

CHLORIDE STORAGE TANK 2800
GALLON CAPACITY. SOME
PRODUCT STORAGE.

SEVERAL MIXERS. FLOOR IS

CONCRETE WITH A GRATING
AT THE ENTRANCE.THERMS ARE BRIMIST VENTS
ON EACH TANK. THESE ARE
PERMITTED.

T.S.

(110)

12:26 TOUR CONCLUDED.

LEFT SITE TO GET

A CAMERA. SITE - CAMERA

DID NOT WORK

12:45 RETURN TO SITE. TO TAKE

PHOTOS. PHOTOS OF: PAINT
MIXINGAREA WITH AIR EMISSION DEVICES,
GRATING IN FLOOR, EMERGENCYSPILL BACK UP TANK, HAZARDOUS
WASTE DRUM STORAGE AREA, RAW
MATERIAL STORAGE AREA, RAW MATERIAL
DELIVERY AREA.

TOUR CONCLUDED - 1:00 PM

G.S. PLASTICS
STERLING ENGRS PROX 5/24/92

WEATHER: SUNNY CLEAR SKIES ~ 68°
SHOWING MAHMOUD & TOM SAWYER ARRIVE
ON SITE @ 08:55.

WAITING FOR VINCE ^{BRAYTON} ~~BRAYTON~~ & JOHN
LEITCH TO ARRIVE @ FACILITY. JOHN
LEITCH IS STERLING ENGR PROXES (SEP)
CAB MGR.

09:05 START MTG W/ VINCE IN CONFERENCE
ROOM.

^{PREVIOUS}
FACILITY HISTORY BUILDING BUILT IN 1949/8
KLAUSNER COOPERAGE - USED TO MAKE
WOODEN BARRELS.

GS PLASTICS ORIGINALLY STARTED ~ 1950'S
AT CURRENT LOCATION MOVED SOMEWHERE
IN THE 60'S.

GS⁸⁶ → STERLING⁸⁸ → PERDQUIP¹⁹⁸⁸ → STERLING^{END OF}
CURRENTLY STERLING ENGR PROXES.

5/20/92

LET (1984 GREENS FORD).

UP TO 1970'S EXTRUSION EMPLOYED PRODUCTION.
SUSANSON PEARNS + PASTILLES - MIXED @ HIGH
TEMP. 220°F
SPEED - BEGINS ABSORBS PARTICLES &
DUMPED INTO COLLERO - PROCESSED THEN
EXTRUDER.

CHIPPING PLASTICS, CO POLYESTER
ADHESIVES, INDUSTRIAL PAINTS &
COATINGS (BUSINESS POLYURETHANE) (M.C.)
PRIMARY SOLVENTS - METHYLENE CHLORIDE
~ 250,000 LBS / YR. GENERALLYSM GENERATED.
GOODYEAR POLYESTER^{SAB} BLENDED W/ MC
TOLUENE & MEK BLENDED TILL SOLUTION
FORM & SHIPPED TO CUSTOMER. (CHECK FOR SOLID
LEVEL)
AFTER PUMPED INTO DRUMS. (DEPENDENT ON CUSTOMER
SPECS.)
KEEP 10-25 DRUMS SHIPPED.
540 LBS / DRUM

5/10/92

NO WASTE GENERATED IN PAINT DEPT.
SOLVENTS MEK, TOL & MIBK ARE USED TO
RUNSE BLADES (SPINDE MIXING UNITS)
THE SOLVENTS ARE USED FOR MAINTENANCE
COATING FOR CUSTOMERS RECEIVING
LOW END INDUSTRIAL COATINGS (XL8)

FACILITY HAS 2 DEPTS:
PLASTICOL & PAINT DEPT.

1470-1 PAINT 100 gal/MTH.

CURRENTLY 50% OF PRODUCTS ARE SOLVENT
BASED.

LIST OF PRODUCTS OUT OF PAINT DEPT.
(CIP)

COPOLYMER ADHESIVES, SWIMMING

POOL PAINTS (SOL BASED FORM) PRIMERS
& REDUCERS. (EXTENDS THE LIFE OF
PRIMER
PRODUCTS)

ALL WASTES IN PAINT DEPT IS RECYCLED.

5/20/92

SEAL MORE RECYCLED. A SAMPLE FOR
QUALITY PURPOSES IS KEPT IN A CAB
FOR A PERIOD OF 6 MTH IN AN
EXPLOSION PROOF ROOM/CABINET.

LIST OF PRODUCTS FROM PLASTICOL DEPT.
PLASTICOL IS ~~DE~~ TOL DIAPHRAGM
COMPD INDUSTRY - FISHING LINE
MEDICAL INDUSTRY - CONSTRUCTION
RACK COATING (PLATING)
RESPERONICS INC. FORMS MEDICAL
EQUIPMENT. (RESUSCITATION MASK).

PLASTICOL PROCESS

MIXING UNITS. CARBON STEEL OR
STAINLESS STEEL VATS. CAPACITY 5-1500 GALLONS.

INITIAL PLASTICOL⁸ INTRODUCED.

DOP (DIOCTYL ^{SEBACATE} ~~SEBACATE~~) STABILIZERS

MODIFIERS, SEBACIC AC. BLEND FOR


(33)

5/20/92

15 SECOND DISPERSION RESIN IS
 INTRODUCED TO IT. (DIFF. BRANDS)
 (BT GRADUIN, DRYDENTINE, GOODYEAR SUPPLY
 DISPERSION RESIN) SUCH DROPPED
 PLASTICIZER (RESIN TAKES ABOUT
 20-25 MINS TO BLEND IN FOR A
 SMOOTH CONSISTENCY.) PIGMENT
 MAY BE INTRODUCED PER REQUEST.
 MATEL IS TESTED FOR VISCOSITY ^{ON} ^{DETERMINED}
 CUSTOMER SPECS. & VACUUMED PER
 REMOVING AIR & WATER. W/IN
 THE DISPERSION RESIN.
 MATERIAL IS PUT INTO CONTAINERS
 PER CUSTOMER REQUEST. 5 gallon -
 55 GALLON DRUMS (PER) & SHIPPED.
 WASTE SEPARATED - (WASH OUT MIXING UNIT)
 WASH OUT MIXER W/ AROMATIC 100

(34)

5/20/92

SOLVENT. RINSE W/ PLASTICIZER
 (SO NO RUST FORM CARBON STEEL ONLY)
 REUSE. SOLVENT & PLASTICIZER UNTIL
 NO LONGER EFFECTIVE. SOLVENT ARE PLACED
 IN A 55-GALLON DRUM. SOLVENT ANY
 RESINS SEPARATE. SOLVENTS & PLASTICIZER
 SEPARATE. & REUSE SOLVENT P. 2/5 
 SIZE OF PLASTICIZER USED AS LOW END
 PRODUCT. COLLECT P. SHIPPED OUT 20-30
 DRUMS/YR. BY HUKILL CHEM CORP.
 AUG 17-20 DRUMS/YR.
 before ^{CONTAINED AS} FOODS NOW CLASSIFIED AS
 D001.
 DUST IS COLLECTED IN DUST COLLECTOR & 2
 (RESINS COME IN DRY 50 LB BAGS)
 SEPARATED & REUSED IN LOW END PRODUCT.
 HAZARDOUS WASTE STORAGE AREA -

5/30/72

- A TOTAL OF 20 DRUMS - 8 BEING SHIPPED OUT TODAY. 12 REMAINING WILL BE RECYCLED.
- REQUIRE MSDS FOR ARAMATE 100.
- 1020 JOHN LEITCH TOWNS US IN MTG ROOM.
- PERMEATION CUT - ABOVE 100' FEASIBLE.
- Above GROUND STORAGE TANK. 16 TANKS.
- 3 OUTSIDE - REMAINING ARE INSIDE
- FACILITY ALL STORE RAW PRODUCTS.
- ALL IN LIQUID FORM.
- DISCARDED SILO TO BE SHUT OFF.
- DON'T REQUIRE NPDES PERMIT.
- NO VIOLATIONS CITED.
- BACK IN 73-74 SILO EXCHANGED VIA VACUUM. DIDP - 200 GALLONS.
- EXCHANGED IN PLASTIC DEPT.
- FLOOR DRAINS ARE NOW CAPPED.
- AS OF LAST APRIL - APRIL 91

5/30/72

DUT WEREN'T THERE. POSSIBLE DISMANTLING
CORP-POLICY NOW TO CAP ALL
FLOOR DRAINS & CITY SEWER SYSTEM.
OF EMPLOYEES AT THE FACILITY
IS 11.
APPROX 30,000 SQ FT.
NO G.W. WELLS ON FACILITY.
LINKED FROM CITY WATER SYSTEM
FOR INDUSTRIAL / DOMESTIC USE.
INDUSTRIAL USE VINYL ETCH COMPD
85% PHOSPHORIC ACID & WATER.
END PRODUCT. W/14% WASTE GENERATED.
FACILITY E, W, N, & S SURROUNDED BY
INDUSTRIAL USES AREA.
REGULATORY STATUS CURRENTLY - AS
SMALL QTY GENERATOR. SM STORING FOR
LESS THAN 90 DAYS.

5/24/92
FILED UNDER PROTECTIVE FILE.

NO CLOSURE PLANS WERE FOLLOWED. NO
DECONTAMINATION IF ANY CLOSURE
WAS REQUIRED AT STEELING ENER. PROD.
FACILITY.

HAZ WASTE STORAGE AREA - NO CURRENT RECORD
DATE OF SHUT-UP - 83 (MAY OR JUNE)
- PREVIOUSLY HAZ WASTE WAS CONSOLIDATED
IN PLASTIC AREA & SHIPPED OUT
15-20 DRUMS/SEVERAL MTH.

NO COMPLAINTS FROM LOCAL RESIDENCE.
OF SMOKE, DUST, ETC.

NOTE:

NEWBURGH & SOUTH SHORE RR.

ONCE AMTH GE BROUGHT IN DIESEL
ENGINES FOR REBUILDING.

11.14 START TOUR OF FACILITY
OUTSIDE OF FACILITY BY RR TRACKS.

(93)

5/24/92

DISABLED SYCO. (FOR SALE) USED FOR 2
SECURITY FENCE AROUND AROUND
& SUSPENSION REGION COLLECTION.

* PAINT JET & TANKS. (3)

TANK FARM HOLDS ABOUT 6000 GALL
TANK - VENTILATION EXHAUST SYSTEM
FROM TANKS UP ON THE SIDE OF BLDG.

SECURITY TANK. 250 GALL. FOR SPILL.

3 FT. CEMENT DIKE WIDE ALONG THE
BACK SIDE OF THE FACILITY.

PHOTO #1 SUMMIT 1 - EMERGENCY spill
CONTAINMENT TANK - NEVER BEEN USED
(BATTERY NO GOOD - CAMERA INOPERATIVE)

EARLY 70'S 73-74 INSTRUCTIONS

OUTSIDE PLASTER DEPT. THE BLDG
HAS SPRINKLING ON THE WALL & ON THE GROUND
WHERE ALL FIRES ARE LOCATED - SPRINKLING

7/9/12
7/9/12
43)
5/20/12
FOS-BEH PRODUCT AREA
11.35 ENTER LAB AREA

FEASIBLE PRODUCTS IN FIA
(CONTAINER) (RETAILS)

SMALL SCALE 1 GALLON SAMPLES
LAB USED FOR R & D & QC OF
MATERIALS

PLASTIC AREA MIXING AREA

DUST COLLECTOR CAPTURED ALL OF
THE MIXING. DUST COLLECTOR IS
EMPTYED OUT 2/YR. DUST IS RECYCLED
ALL SEWER DRAINS ARE SEALED.
EMPTY STORAGE AREA.

RAW MATERIALS & FRAGMENTS IN DRUMS
VATS (L, H, I, X) ON FACILITY MAP
POWDER DEPT. STORAGE & MIXING
(1500 GALLON MIXER).

STORAGE OF EMPTY DRUMS.

RECYCLED DRUMS - FILLED w/ RAW MATERIALS
BTES - ABOUT 300 LBS. STEEL TANKS,
(BELONG TO CUSTOMERS)

FINISHED GOODS DRUMS FOR CUSTOMER
HAZARDOUS WASTE STORAGE AREA
20 DRUMS (55 GALLON) DRUMS PROPERLY
LABELLED - NO SPILL OR RELEASE IS
EVIDENT. NO BARRIERS OR DICES ARE
PRESENT AROUND DRUMS.

SPILL KIT & PPE ADJACENT TO HAZ WASTE
AREA. INVENTORIED EVERY MTH.
FIRE EXTINGUISHER, GLOVES, BOOTS, PERSONAL
PROTECTIVE EQUIPMENT (EMERGENCY SUPPLIES)

INITIALLY PROCESS START HERE IN
POWDER DEPT. - RAW MATERIALS MIXED
(RESINS)
GLASS FORMED IN MIXED VERSATOR

12:54 PHOTO #1 3 JOINT DEPT
PHOTO #4 CRACKED GULL IN

FLOOR.

12:55 PHOTO #5 EMERGENCY SPILL
TANK STORAGE AREA.

12:56 PHOTO 7 VENTILATION OF
TANKS.

12:58 PHOTO 8 HAZ WASTE STORAGE AREA.

12:59. PHOTO 11 ACC - OUTSIDE
POWDER MIXING AREA.

13:02 BACK IN CONFERENCE ROOM FOR
A. WRAP UP MTG.

SCAB - SOLID 50 lbs boxes 1-316. EXH.

13:19 FINAL MTG W/ PLNCE.

MTG CONCLUDED. AND OFF SITE
AT 13:21.

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